

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

SMART AUTHENTICATION IP, LLC,

*Plaintiff,*

v.

UNITED SERVICES AUTOMOBILE  
ASSOCIATION, EVERNOTE  
CORPORATION, LOGMEIN, INC,  
MONGODB, INC,

*Defendants.*

CONSOLIDATED LEAD CASE:  
Civil Action No. 2:16-cv-01232-JRG

**JURY TRIAL DEMANDED**

SMART AUTHENTICATION IP, LLC,

*Plaintiff,*

v.

LOGMEIN, INC.

*Defendant.*

Civil Action No. 2:16-cv-01234-JRG

**JURY TRIAL DEMANDED**

**AGREED MOTION TO STAY AND NOTICE OF SETTLEMENT  
BETWEEN PLAINTIFF SMART AUTHENTICATION  
AND DEFENDANT LOGMEIN**

Defendant LogMeIn Inc. (“LogMeIn”) with the agreement of Plaintiff Smart Authentication IP, LLC (“Smart Authentication”), hereby files this Agreed Motion to Stay and Notice of Settlement between Plaintiff Smart Authentication and Defendant LogMeIn.

Smart Authentication and LogMeIn have reached an agreement to settle all matters in controversy between them and have finalized a written agreement. Smart Authentication and LogMeIn wish to conclude this matter without burdening the Court with any additional filings and without incurring unnecessary expense. Therefore, LogMeIn requests a stay of 14 days of all

proceedings, including all pending deadlines, with regard to LogMeIn to allow sufficient time for the parties to complete their performance obligations pursuant to the settlement agreement, after which Smart Authentication and LogMeIn will jointly move for the case to be dismissed.

Accordingly, LogMeIn respectfully requests that the Court stay all proceedings, including all pending deadlines, in civil action no. 2:16-cv-01234-JRG and all proceedings, including all pending deadlines, with regard to LogMeIn in civil action no. 2:16-cv-01232-JRG (the consolidated lead case) until Friday, February 10, 2017.

LogMeIn submits that good cause exists for granting this agreed motion, as set forth above. This motion is not filed for purposes of delay, but so that justice may be served.

WHEREFORE, LogMeIn respectfully requests that the Court enter the proposed order submitted with this agreed motion as set forth above, and grant the parties such other and further relief to which they are entitled.

DATED: January 27, 2017

Respectfully submitted,

By: /s/ Nathaniel J. McPherson

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*Attorneys for Defendant LogMeIn, Inc.*

**CERTIFICATE OF CONFERENCE**

I hereby certify that on January 27, 2017, I conferenced by email with counsel for Plaintiff. Plaintiff's counsel has agreed to the form and substance of this motion. Accordingly, this motion is an agreed motion.

/s/ Nathaniel J. McPherson

Nathaniel J. McPherson

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system, in accordance with Local Rule CV-5(a)(3), on January 27, 2017.

/s/ Nathaniel J. McPherson

Nathaniel J. McPherson